

MEMO ENDORSED

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July 9, 2007

VIA FACSIMILE (914) 390-4085

The Honorable Charles L. Brieant
United States District Judge
Southern District of New York
300 Quaropas Street, Room 275
White Plains, NY 10601-4150

Application granted. Conference now scheduled for
July 24, 2007 at 9:30
Time is excluded under the Speedy Trial Act through
July 24, 2007
SO ORDERED. Charles L. Brieant U.S.D.J.
Dated: 7-10-2007
Re: United States v. Adelina Jimer ez
Docket No. 07 Cr. 424


Dear Judge Brieant:

I am writing to request an adjournment of the status conference currently scheduled before Your Honor on July 10, 2007 at 9:15 a.m. for the reasons that follow, as the parties are finalizing negotiations of an anticipated guilty plea pursuant to a cooperation agreement.

We understand that Assistant United States Attorney Marcia Cohen has had a telephone conversation with Your Honor's Courtroom Deputy, Ms. Alice Cama, who has informed that the Court is available for a conference on July 24, 2007, at 9:30 a.m. If Your Honor would consider such an adjournment, it is respectfully submitted that it is in the interest of the parties to work toward a final resolution of these charges. In addition, as we are completing plea negotiations, the defense has no objection to an Order of Excludable Delay from July 10, 2007 through July 24, 2007, because of the ongoing negotiations and the likely advantages my client would gain from such a disposition.

Your patience and understanding is greatly appreciated.

Respectfully submitted,


Mark I. Cohen, Esq.

MIC/jrb

Cc: A.U.S.A. Marcia Cohen